

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: ANADARKO PETROLEUM
CORPORATION SECURITIES
LITIGATION

Case No. 4:20-cv-576

District Judge Charles R. Eskridge III

CLASS ACTION

DECLARATION OF LAUREN M. ROSENBERG
IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Pursuant to 28 U.S.C. § 1746, I, Lauren M. Rosenberg, declare as follows:

1. I am a Partner in the law firm Cravath, Swaine & Moore LLP and have been admitted *pro hac vice* as counsel to Defendants Anadarko Petroleum Corporation, R. A. Walker, Robert G. Gwin, Robert P. Daniels, and Ernest A. Leyendecker III, in the above-captioned action.

2. I respectfully submit this declaration in support of Defendants' Motion to for Summary Judgment.

Deposition Transcripts

3. Submitted with this Declaration as Exhibit 1 is a true and correct copy of excerpts from the deposition transcript of Carlotta Chernoff in this litigation, dated June 16, 2022.

4. Submitted with this Declaration as Exhibit 2 is a true and correct copy of excerpts from the deposition transcript of Charles “Chip” F. Oudin III in this litigation, dated June 30, 2022.

5. Submitted with this Declaration as Exhibit 3 is a true and correct copy of excerpts from the deposition transcript of Chris Camden in this litigation, dated July 14, 2022.

6. Submitted with this Declaration as Exhibit 4 is a true and correct copy of excerpts from the deposition transcript of Robert Strickling in this litigation, dated July 21, 2022, and marked as deposition exhibit 550.

7. Submitted with this Declaration as Exhibit 5 is a true and correct copy of excerpts from the deposition transcript of Paul Chandler in this litigation, dated July 28, 2022.

8. Submitted with this Declaration as Exhibit 6 is a true and correct copy of excerpts from the deposition transcript of Patrick McGrievy in this litigation, dated August 24, 2022.

9. Submitted with this Declaration as Exhibit 7 is a true and correct copy of excerpts from the deposition transcript of Darrell Hollek in this litigation, dated September 1, 2022.

10. Submitted with this Declaration as Exhibit 8 is a true and correct copy of excerpts from the deposition transcript of Ernest A. Leyendecker III in this litigation, dated September 22, 2022.

11. Submitted with this Declaration as Exhibit 9 is a true and correct copy of excerpts from the deposition transcript of Catherine Anne Green in this litigation, dated September 28, 2022.

12. Submitted with this Declaration as Exhibit 10 is a true and correct copy of excerpts from the deposition transcript of Lea Frye in this litigation, dated October 7, 2022.

13. Submitted with this Declaration as Exhibit 11 is a true and correct copy of excerpts from the deposition transcript of Robert P. Daniels in this litigation, dated October 13, 2022.

14. Submitted with this Declaration as Exhibit 12 is a true and correct copy of excerpts from the deposition transcript of James Kleckner in this litigation, dated October 14, 2022.

15. Submitted with this Declaration as Exhibit 13 is a true and correct copy of excerpts from the deposition transcript of Al Walker in this litigation, dated October 20, 2022.

16. Submitted with this Declaration as Exhibit 14 is a true and correct copy of excerpts from the deposition transcript of Mark L. Zajak in this litigation, dated November 2, 2022.

17. Submitted with this Declaration as Exhibit 15 is a true and correct copy of excerpts from the deposition transcript of Robert Merrill in this litigation, dated December 7, 2022.

18. Submitted with this Declaration as Exhibit 16 is a true and correct copy of excerpts from the deposition transcript of Lyndon Pittinger in this litigation, dated December 16, 2022.

19. Submitted with this Declaration as Exhibit 17 is a true and correct copy of excerpts from the deposition transcript of Bjorn Steinholt in this litigation, dated December 21, 2022.

20. Submitted with this Declaration as Exhibit 18 is a true and correct copy of excerpts from the deposition transcript of D. Paul Regan in this litigation, dated January 20, 2023.

Expert Reports

21. Submitted with this Declaration as Exhibit 19 is a true and correct copy of the Expert Report of D. Paul Regan, dated November 9, 2022, and marked as deposition exhibit 515.

22. Submitted with this Declaration as Exhibit 20 is a true and correct copy of the Expert Report of Robert Merrill, dated November 9, 2022, and marked as deposition exhibit 498.

23. Submitted with this Declaration as Exhibit 21 is a true and correct copy of the Expert Report of Bjorn Steinholt, dated November 9, 2022, and marked as deposition exhibit 503.

24. Submitted with this Declaration as Exhibit 22 is a true and correct copy of the Expert Report of Lydon Pittinger, dated November 29, 2022, and marked as deposition exhibit 499.

25. Submitted with this Declaration as Exhibit 23 is a true and correct copy of the Expert Rebuttal Report of Bjorn Steinholt, dated January 25, 2023, and marked as deposition exhibit 549.

26. Submitted with this Declaration as Exhibit 24 is a true and correct copy of the Expert Rebuttal Report of Noam P. Berk, dated January 25, 2023, and marked as deposition exhibit 543.

27. Submitted with this Declaration as Exhibit 25 is a true and correct copy of the Expert Report of Rocco Detomo, Jr., dated January 25, 2023, and marked as deposition exhibit 527.

28. Submitted with this Declaration as Exhibit 26 is a true and correct copy of the Expert Rebuttal Report of Kevin J. Murphy, dated January 25, 2023.

Documents from Discovery

29. Submitted with this Declaration as Exhibit 27 is a true and correct copy of Anadarko's Accounting Bulletin on Well Classification and Disposition of Suspended Well Costs, dated July 1, 2007, beginning with Bates number APC-00113426.

30. Submitted with this Declaration as Exhibit 28 is a true and correct copy of an email from E. Leyendecker to D. Blakely et al. RE: Shenandoah Work Group, dated April 4, 2013, beginning with Bates number APC-00573912 and marked as deposition exhibit 250.

31. Submitted with this Declaration as Exhibit 29 is a true and correct copy of an email from J. Lime to B. Daniels FW: QK 7D Suspended wells, dated May 1, 2013, beginning with Bates number APC-00577160.

32. Submitted with this Declaration as Exhibit 30 is a true and correct copy of a KPMG Suspended Well Costs Memorandum, dated January 15, 2014, beginning with Bates number KPMG_APC_eA_0002511 and marked as deposition exhibit 485.

33. Submitted with this Declaration as Exhibit 31 is a true and correct copy of the Ratification, Joiner and Third Amendment of Operating Agreement, dated April 1, 2014, beginning with Bates number ANACOP00003083.

34. Submitted with this Declaration as Exhibit 32 is a true and correct copy of a letter from Anadarko to ConocoPhillips et al. RE: Shenandoah Prospect Anadarko AFE No. 2087315, dated April 8, 2014, beginning with Bates number APC-00005093 and marked as deposition exhibit 186.

35. Submitted with this Declaration as Exhibit 33 is a true and correct copy of the Shenandoah Appraisal Program Partnership Meeting Presentation, dated December 10, 2014, beginning with Bates number APC-00001146 and marked as deposition exhibit 71.

36. Submitted with this Declaration as Exhibit 34 is a true and correct copy of a GOM Exploration Engineering Activity Report, dated January 7, 2015, beginning with Bates number APC-00153588.

37. Submitted with this Declaration as Exhibit 35 is a true and correct copy of a letter from Anadarko to ConocoPhillips et al. RE: Shenandoah Prospect Anadarko AFE No. 2104486, dated February 9, 2015, beginning with Bates number APC-00022648.

38. Submitted with this Declaration as Exhibit 36 is a true and correct copy of an email from J. Pachman to E. Leyendecker et al. RE: Shenandoah - WR 52 #2 (Shen 3) => COP 4TH Qtr Report, dated February 12, 2015, beginning with Bates number APC-00626533.

39. Submitted with this Declaration as Exhibit 37 is a true and correct copy of an email from L. Frye to B. Johnson et al. RE: WR# 3 ST01 Interpretation & Update, dated September 21, 2017, beginning with Bates number APC-00646864 and marked as deposition exhibit 358.

40. Submitted with this Declaration as Exhibit 38 is a true and correct copy of the Shenandoah Exploration Overview Presentation, dated November 3, 2015, beginning with Bates number APC-00001935.

41. Submitted with this Declaration as Exhibit 39 is a true and correct copy of a letter from Anadarko to ConocopPhilips et al. RE: Shenandoah Prospect – Walker Ridge Block 51 #3(ST1BP1) Well Operator’s Recommendation at Objective Depth, dated November 25, 2015, beginning with Bates number Marathon_014843.

42. Submitted with this Declaration as Exhibit 40 is a true and correct copy of an email from J. Pachman to J. Bryan FW: Shenandoah Prospect – Project Schedule, dated December 8, 2015, beginning with Bates number APC-00214429.

43. Submitted with this Declaration as Exhibit 41 is a true and correct copy of a letter from ConocoPhillips to Anadarko et al. RE: Shenandoah Prospect – Walker Ridge Block 51 #3 ST2 Well Proposal, dated December 10, 2015, beginning with Bates number APC-01730272.

44. Submitted with this Declaration as Exhibit 42 is a true and correct copy of an email from J. Pachman to M. Brown RE: Shen-4 S/T 2 Status, dated December 14, 2015, beginning with Bates number APC-00216034.

45. Submitted with this Declaration as Exhibit 43 is a true and correct copy of an email from J. Pachman to B. Davis et al. FW Directional Plan for ST03, dated January 4, 2016, beginning with Bates number APC-00356191.

46. Submitted with this Declaration as Exhibit 44 is a true and correct copy of an email from L. Frye to P. McGrievy et al. re: Final Resource Distribution, and corresponding attachment, Shenandoah Un-Risked Geologic Resource Estimates, both dated January 13, 2016, beginning with Bates numbers APC-00663563 and APC-00663564 respectively and marked as deposition exhibit 139.

47. Submitted with this Declaration as Exhibit 45 is a true and correct copy of an email from AFE Approval to A. Walker re: Action Required - #624550 AFE Request, dated January 27, 2016, beginning with Bates number APC-00222712.

48. Submitted with this Declaration as Exhibit 46 is a true and correct copy of the Shenandoah 5, WR 51 #4 Appraisal Well Proposal (Pre-read) Presentation, dated February 1, 2016, beginning with Bates number APC-00223099 and marked as deposition exhibit 141.

49. Submitted with this Declaration as Exhibit 47 is a true and correct copy of an email from Workflow System to I. Shareef et al. re: AFE Approved – Walker Ridge 51 #4, dated February 2, 2016, beginning with Bates number APC-00667721.

50. Submitted with this Declaration as Exhibit 48 is a true and correct copy of the Shenandoah Area Block Operational Well Spreadsheet, dated February 26, 2016, beginning with Bates number Marathon_014286.

51. Submitted with this Declaration as Exhibit 49 is a true and correct copy of the Shenandoah WR 51#4 Well Recommendation Presentation, dated March 14, 2016, beginning with Bates number APC-00067336.

52. Submitted with this Declaration as Exhibit 50 is a true and correct copy of the Purchase and Sale Agreement of Shenandoah Prospect between Marathon Oil Company and Venari Offshore LLC, dated March 29, 2016, beginning with Bates number APC-00358928.

53. Submitted with this Declaration as Exhibit 51 is a true and correct copy of an email from A. Gandhi to W. Prosser et al. RE: Portfolio Spring Update – Shenandoah, dated April 7, 2016, beginning with Bates number APC-00070330.

54. Submitted with this Declaration as Exhibit 52 is a true and correct copy of a letter from Minces PLLC to A. McMillian Re: Lea Frye | Sarbanes-Oxley/Dodd-Frank Settlement Demand, dated April 20, 2016, beginning with Bates number APC-00000536 and marked as deposition exhibit 369.

55. Submitted with this Declaration as Exhibit 53 is a true and correct copy of the Forward Plan Formulation EC Discussion Presentation, dated April 27, 2016, beginning with Bates number APC-01355223 and marked as deposition exhibit 456.

56. Submitted with this Declaration as Exhibit 54 is a true and correct copy of an email from J. Pachman to R. Ozuna et al. RE: Shenandoah Pref Right, dated May 5, 2016, beginning with Bates number APC-00244786.

57. Submitted with this Declaration as Exhibit 55 is a true and correct copy of an email from J. Pachman to B. Smith et al. re: Shenandoah Venari Pref- Right Deal, dated May 6, 2016, beginning with Bates number APC-00245433.

58. Submitted with this Declaration as Exhibit 56 is a true and correct copy of a letter from Minces PLLC to SEC Re: Lea Frye | Summary of Dodd-Frank Act Violations

by Anadarko, dated May 9, 2016, beginning with Bates number APC-00113302 and marked as deposition exhibit 355.

59. Submitted with this Declaration as Exhibit 57 is a true and correct copy of the 2016 Strategy Development “Back to Work” Commodity Price Scenario Analysis Presentation, dated June 13, 2016, beginning with Bates number APC-01362172 and marked as deposition exhibit 458.

60. Submitted with this Declaration as Exhibit 58 is a true and correct copy of a Shenandoah EC update Presentation, dated July 25, 2016, beginning with Bates number APC-00704016.

61. Submitted with this Declaration as Exhibit 59 is a true and correct copy of a Shenandoah EC update Presentation, dated September 14, 2016, beginning with Bates number APC-00002305 and marked as deposition exhibit 302.

62. Submitted with this Declaration as Exhibit 60 is a true and correct copy of the Shenandoah 6 AFE Presentation, dated September 14, 2016, beginning with Bates number APC-00276625.

63. Submitted with this Declaration as Exhibit 61 is a true and correct copy of a letter from Anadarko to ConocoPhillips RE: Shenandoah Prospect Anadarko AFE No. 2124648, dated September 21, 2016, beginning with Bates number ANACOP00002102.

64. Submitted with this Declaration as Exhibit 62 is a true and correct copy of Anadarko's Inter-Office Correspondence from Property Accounting to Distribution re: Q3 2016 – Shenandoah-3 Suspended Well Accounting Analysis, dated November 10, 2016, beginning with Bates number APC-00002132.

65. Submitted with this Declaration as Exhibit 63 is a true and correct copy of an email from B. Johnson to B. Tedesco et al. re: Shen-6 Update, dated January 3, 2017, beginning with Bates number APC-00291032.

66. Submitted with this Declaration as Exhibit 64 is a true and correct copy of an email from J. Ramsey to P. Chandler et al. RE: Shen 6 Sidetrack, dated February 7, 2017, beginning with Bates number APC-00725877.

67. Submitted with this Declaration as Exhibit 65 is a true and correct copy of a memorandum from the Shenandoah Subsurface Team to E. Leyendecker RE: Project Recommendation: Conduct sidetrack out of the WR52 #3 (Shen #6) appraisal well, dated February 13, 2017, beginning with Bates number APC-00299954.

68. Submitted with this Declaration as Exhibit 66 is a true and correct copy of an email from Workflow System to J. Ramsey re: AFE Approved – WR52 #3 (Shen 6) Sidetrack, dated February 15, 2017, beginning with Bates number APC-00089435.

69. Submitted with this Declaration as Exhibit 67 is a true and correct copy of an email from J. Roberts to K. Rasmusson et al. Fwd: Info on Shenandoah #6, dated February 16, 2017, beginning with Bates number APC-00300370.

70. Submitted with this Declaration as Exhibit 68 is a true and correct copy of an email from P. McGrievy to D. Brown et al. RE: Shen 6St01 – BP01 – Update 4 – 04.02.17, dated April 3, 2017, beginning with Bates number APC-00091554.

71. Submitted with this Declaration as Exhibit 69 is a true and correct copy of the Shenandoah Project Update & Path Forward Executive Committee Review Presentation, dated April 4, 2017, beginning with Bates number APC-00091671.

72. Submitted with this Declaration as Exhibit 70 is a true and correct copy of a memorandum from the Shenandoah Development Team to D. Brown RE: Fireside Chat: Options to Maximize Shenandoah Value Creation, dated May 30, 2017, beginning with Bates number APC-00362397.

73. Submitted with this Declaration as Exhibit 71 is a true and correct copy of a letter from Cobalt International to P. McGrievy RE: Request to Expand June 14th Meeting Agenda and Associated Deliverables, dated June 5, 2017, beginning with Bates number APC-00739429.

74. Submitted with this Declaration as Exhibit 72 is a true and correct copy of the Unit Operating Agreement – Shenandoah Prospect, dated July 10, 2017, beginning with Bates number APC-00741533.

75. Submitted with this Declaration as Exhibit 73 is a true and correct copy of the Shenandoah Prospect Exploration & Development Hierarchy, dated August 31, 2017, beginning with Bates number APC-00328549.

76. Submitted with this Declaration as Exhibit 74 is a true and correct copy of an email from J. Pachman to M. Fitzgerald et al. re: Shenandoah, dated September 21, 2017, beginning with Bates number APC-00328743.

77. Submitted with this Declaration as Exhibit 75 is a true and correct copy of an email from P. McGrievy to A. Sanders Re: EC Offsite slide for Shenandoah, dated October 15, 2017, beginning with Bates number APC-00750132.

78. Submitted with this Declaration as Exhibit 76 is a true and correct copy of a letter from ConocoPhillips to Anadarko Re: Shenandoah Prospect - Shenandoah WR51#5 ("Shen-7") Well AFE, dated December 6, 2017, beginning with Bates number APC-00336945.

79. Submitted with this Declaration as Exhibit 77 is a true and correct copy of an email from P. McGrievy to C. Beard et al. RE: BOD Memo – December, dated December 8, 2017, beginning with Bates number APC-00754122.

80. Submitted with this Declaration as Exhibit 78 is a true and correct copy of a letter from Anadarko to ConocoPhillips et al. RE: Shenandoah Prospect Withdrawal Notice and Written Notice to Join in the Withdrawal, dated December 12, 2017, beginning with Bates number APC-00754345.

81. Submitted with this Declaration as Exhibit 79 is a true and correct copy of excerpts from the Navitas Petroleum Annual Report 2021 with a Certified Translation, dated December 31, 2021, beginning with Bates number APC-01760538.

82. Submitted with this Declaration as Exhibit 80 is a true and correct copy of Chris Camden's signed declaration, dated January 23, 2023.

Public Statements and Filings

83. Submitted with this Declaration as Exhibit 81 is a true and correct copy of a Business Wire Press Release titled "Anadarko Announces Another Deepwater Gulf of Mexico Discovery", dated February 4, 2009, beginning with Bates number APC-01335462.

84. Submitted with this Declaration as Exhibit 82 is a true and correct copy of a Press Release titled "Anadarko Announces Another Shenandoah Appraisal Well Encounters More than 1,000 Net Feet of Oil Pay", dated March 19, 2013, beginning with Bates number APC-00572655.

85. Submitted with this Declaration as Exhibit 83 is a true and correct copy of Anadarko's Q1 2013 Earnings Call Transcript, dated May 7, 2013, beginning with Bates number APC-01751685.

86. Submitted with this Declaration as Exhibit 84 is a true and correct copy of ConocoPhillips' Q4 2014 Earnings Call Transcript, dated January 29, 2015, beginning with Bates number APC-01753865.

87. Submitted with this Declaration as Exhibit 85 is a true and correct copy of Anadarko's Q4 2014 Operations Report, dated February 2, 2015, beginning with Bates number APC-01752386.

88. Submitted with this Declaration as Exhibit 86 is a true and correct copy of Anadarko's Form 10-K, dated February 20, 2015, beginning with Bates number APC-01751751.

89. Submitted with this Declaration as Exhibit 87 is a true and correct copy of Cobalt International's Form 10-K, dated February 23, 2015, beginning with Bates number APC-01752435.

90. Submitted with this Declaration as Exhibit 88 is a true and correct copy of Marathon Oil's Form 10-K, dated March 2, 2015.

91. Submitted with this Declaration as Exhibit 89 is a true and correct copy of Anadarko's Form 8-K, dated March 3, 2015, beginning with Bates number STEINHOLT_0010436.

92. Submitted with this Declaration as Exhibit 90 is a true and correct copy of Anadarko's Capital Program and Guidance Call Transcript, dated March 3, 2015, beginning with Bates number APC-00868400 and marked as deposition exhibit 380.

93. Submitted with this Declaration as Exhibit 91 is a true and correct copy of Anadarko's Capital Program and Guidance Call Presentation, dated March 3, 2015, beginning with Bates number APC-01753643.

94. Submitted with this Declaration as Exhibit 92 is a true and correct copy of Anadarko's Q1 2015 Form 10-Q, dated May 4, 2015, beginning with Bates number STEINHOLT_0010575.

95. Submitted with this Declaration as Exhibit 93 is a true and correct copy of Anadarko's Q1 2015 Earnings Call Transcript, dated May 5, 2015, beginning with Bates number APC-01751480.

96. Submitted with this Declaration as Exhibit 94 is a true and correct copy of Anadarko's UBS Global Oil & Gas Conference Transcript, dated March 20, 2015, beginning with Bates number APC-01757327.

97. Submitted with this Declaration as Exhibit 95 is a true and correct copy of Anadarko's Form 8-K, dated July 28, 2015, beginning with Bates number STEINHOLT_0011373.

98. Submitted with this Declaration as Exhibit 96 is a true and correct copy of Anadarko's Q2 2015 Earnings Call Transcript, dated July 29, 2015, beginning with Bates number APC-00186607.

99. Submitted with this Declaration as Exhibit 97 is a true and correct copy of Anadarko's Form 8-K, dated October 27, 2015, beginning with Bates number STEINHOLT_0011498.

100. Submitted with this Declaration as Exhibit 98 is a true and correct copy of Anadarko's Q3 2015 Operations Report, dated October 27, 2015, beginning with Bates number JanHen_00014482 and marked as deposition exhibit 506.

101. Submitted with this Declaration as Exhibit 99 is a true and correct copy of Anadarko's Q3 2015 Earnings Call Transcript, dated October 28, 2015, beginning with Bates number APC-00206911 and marked as deposition exhibit 388.

102. Submitted with this Declaration as Exhibit 100 is a true and correct copy of Anadarko's Jefferies Energy Conference Transcript, dated November 11, 2015, beginning with Bates number APC-00655207 and marked as deposition exhibit 329.

103. Submitted with this Declaration as Exhibit 101 is a true and correct copy of Anadarko's Q4 2015 Earnings Call Transcript, dated February 2, 2016, beginning with Bates number APC-01751417.

104. Submitted with this Declaration as Exhibit 102 is a true and correct copy of Anadarko's Form 10-K, dated February 17, 2016, beginning with Bates number APC-00227144.

105. Submitted with this Declaration as Exhibit 103 is a true and correct copy of Anadarko's Credit Suisse Energy Summit Transcript, dated February 24, 2016, beginning with Bates number APC-01753694.

106. Submitted with this Declaration as Exhibit 104 is a true and correct copy of Anadarko's Form 8-K, dated March 1, 2016 beginning with Bates number STEINHOLT_0012087.

107. Submitted with this Declaration as Exhibit 105 is a true and correct copy of Anadarko's Q1 2016 Earnings Call Transcript, dated May 3, 2016, beginning with Bates number APC-01751647 and marked as deposition exhibit 545.

108. Submitted with this Declaration as Exhibit 106 is a true and correct copy of Anadarko's Citi Global Energy and Utilities Conference Transcript, dated May 11, 2016, beginning with Bates number APC-01319748 and marked as deposition exhibit 330.

109. Submitted with this Declaration as Exhibit 107 is a true and correct copy of Anadarko's UBS Global Oil & Gas Conference Transcript, dated May 24, 2016, beginning with Bates number APC-01753704 and marked as deposition exhibit 547.

110. Submitted with this Declaration as Exhibit 108 is a true and correct copy of Anadarko's UBS Global Oil & Gas Conference Presentation, dated May 24, 2016, beginning with Bates number APC-01753735.

111. Submitted with this Declaration as Exhibit 109 is a true and correct copy of Anadarko's J.P. Morgan Energy Equity Investor Conference Transcript, dated June 28, 2016, beginning with Bates number APC-01319776 and marked as deposition exhibit 461.

112. Submitted with this Declaration as Exhibit 110 is a true and correct copy of Anadarko's Q2 2016 Form 10-Q, dated July 26, 2016, beginning with Bates number APC-01752161.

113. Submitted with this Declaration as Exhibit 111 is a true and correct copy of Anadarko's Form 8-K, dated July 26, 2016, beginning with Bates number STEINHOLT_0013000.

114. Submitted with this Declaration as Exhibit 112 is a true and correct copy of Anadarko's Q2 2016 Earnings Call Transcript, dated July 27, 2016, beginning with Bates number APC-01319830 and marked as deposition exhibit 425.

115. Submitted with this Declaration as Exhibit 113 is a true and correct copy of Anadarko's EnerCom Oil & Gas Conference Transcript, dated August 16, 2016, beginning with Bates number APC-01319805.

116. Submitted with this Declaration as Exhibit 114 is a true and correct copy of Anadarko's UBS Houston Energy Bus-Less Tour Transcript, dated September 14, 2016, beginning with Bates number APC-01319811 and marked as deposition exhibit 463.

117. Submitted with this Declaration as Exhibit 115 is a true and correct copy of Anadarko's Q3 2016 Earnings Call Transcript, dated November 1, 2016, beginning with Bates number APC-01319873.

118. Submitted with this Declaration as Exhibit 116 is a true and correct copy of Anadarko's Q4 2016 Earnings Call Transcript, dated February 1, 2017, beginning with Bates number APC-00724076 and marked as deposition exhibit 331.

119. Submitted with this Declaration as Exhibit 117 is a true and correct copy of Anadarko's Form 10-K, dated February 17, 2017, beginning with Bates number APC-00300433.

120. Submitted with this Declaration as Exhibit 118 is a true and correct copy of Anadarko's Q1 2017 Form 10-Q, dated May 2, 2017, beginning with Bates number APC-01752112.

121. Submitted with this Declaration as Exhibit 119 is a true and correct copy of an Offshore Engineer article titled “Marathon sells Shenandoah stake”, dated April 12, 2016.

Additional Documents in *Daubert* Motions

122. Submitted with this Declaration as Exhibit 120 is a true and correct copy of excerpts from the deposition transcript of Bjorn Steinholt in this litigation, dated March 13, 2023.

123. Submitted with this Declaration as Exhibit 121 is a true and correct copy of the Expert Report of J. Richard Dietrich, dated January 23, 2023, and marked as deposition exhibit 548.

124. Submitted with this Declaration as Exhibit 122 is a true and correct copy of an email from J. Ramsey to T. Trautman FW: Shenandoah UW-1 Update with Appraisal well Option locations, dated April 1, 2014, beginning with Bates number APC-00117333.

125. Submitted with this Declaration as Exhibit 123 is a true and correct copy of an email from P. McGrievy to D. Hollek RE: 2015_03_Shenandoah_Economics_Update.pptx, dated March 24, 2015, beginning with Bates number APC-00025540.

126. Submitted with this Declaration as Exhibit 124 is a true and correct copy of a KPMG Exploration Expense Testwork Memorandum – Dry Hole Expense, dated September 30, 2016, beginning with Bates number KPMG_APC_eA_0007469.

127. Submitted with this Declaration as Exhibit 125 is a true and correct copy of the SEC Staff Accounting Bulletin No. 99—Materiality, dated August 12, 1999.

128. Submitted with this Declaration as Exhibit 126 is a true and correct copy of the FASB, “Accounting Standards Codification—About the Codification”, dated July 2022, and marked as deposition exhibit 553.

129. Submitted with this Declaration as Exhibit 127 is a true and correct copy of the FASB Superseded Standards, including FAS 19, as of March 16, 2023.

130. Submitted with this Declaration as Exhibit 128 is a true and correct copy of the FASB Accounting Standards Codification Topic 105-10-05.

131. Submitted with this Declaration as Exhibit 129 is a true and correct copy of the FASB Accounting Standards Codification Topic 932-360-25.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 16, 2023

/s/Lauren M. Rosenberg
Lauren M. Rosenberg